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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KARUNAMUNIGE CHAMILA	:	Civil Action No. 2:09-cv-05395
KRISHANTHI, et al.,	:	(DMC)(JAD)
Plaintiffs,	:	DECLARATION IN SUPPORT
v.	:	OF DEFENDANT TAMIL
RAJAKUMARA RAJARATNAM,	:	REHABILITATION
JESUTHASAN RAJARATNAM,	:	ORGANIZATION'S
and TAMIL REHABILITATION	:	MOTION TO STAY
ORGANIZATION,	:	Motion Date: April 18, 2011
Defendants.	:	

Stuart A. White, Esq., pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am an attorney, and I represent defendant Tamil Rehabilitation

Organization (hereinafter “TRO-USA”) in the above-captioned case. I make this Declaration in support of TRO-USA’s Motion To Stay the March 10, 2011, Magistrate Judge’s Order Compelling TRO-USA to Produce Discovery.

2. As detailed in the accompanying Memorandum of Law, TRO-USA moves this Court to stay this order because moving forward with the Magistrate Judge’s order before the District Court has decided the motion for reconsideration would render the Motion for Reconsideration moot. Plaintiffs will suffer no prejudice if the March 10, 2011, order is stayed until the Motion for Reconsideration is resolved.

3. Counsel for Defendant TRO-USA, in a March 21, 2011, telephone call with counsel for Plaintiffs, John M. Eubanks, Esq., has learned Plaintiffs do not consent to this motion and will oppose this motion.

4. Attached as Exhibits to this Declaration, and discussed in TRO-USA’s accompanying Memorandum of Law, are the following:

- (a) Exhibit 1: the Magistrate Judge’s March 10, 2011, Order;
- (b) Exhibit 2: TRO-USA’s Motion for Reconsideration of the Magistrate Judge’s March 10, 2011, Order;

WHEREFORE, it is respectfully requested that the Court grant TRO-USA’s Motion to Stay.

I declare under penalty of perjury that the foregoing is true and correct to
the best of my knowledge and belief. 28 U.S.C. §1746.

DATED: March 22, 2011
New York, New York

s/ Stuart A. White
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